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The Honorable Christopher M. Alston
Chapter 11
Hearing Friday, May 4, 2018, 9:30 a.m.
Seattle, Courtroom 7206
Response due Friday, April 27, 2018

14 UNITED STATES BANKRUPTCY COURT
15 WESTERN DISTRICT OF WASHINGTON AT SEATTLE
16

17 In re:
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20 NORTHWEST TERRITORIAL MINT,
21 LLC,
22

23 Debtor.
24
25

Case No. 16-11767-CMA
(Jointly Administered)

HOFF STATEMENT CORRECTING THE
RECORD

26
27 Robert and Connie Hoff (the “*Hoffs*”), landlords of the Dayton Premises, submit this
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29 brief statement in an attempt to correct the record regarding a matter of fact that has been
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31 misstated time and time again by the Trustee, most recently in the Trustee’s Motion for
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33 Order Approving the Sale of Certain of the Debtor’s Assets Free and Clear of all Liens,
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35 Claims, and Encumbrances to Medalcraft Mint, Inc. (the “*Motion*”).
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37

38 The Hoffs filed a UCC-1 financing statement against Medallic Art Limited
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40 Partnership on April 21, 2016, and on May 17, 2016 filed an amendment to that financing
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42 statement, adding Medallic Art Company, LLC (“*MACLLC*”) as a debtor. Those filings are
43
44 a matter of public record and cannot possibly be in dispute. Nevertheless, the Trustee has on
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HOFF STATEMENT CORRECTING RECORD – 1

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1 at least six occasions misstated the date of the filing of the amendment as having occurred in
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3 May 2017. Despite numerous efforts by the Hoffs' counsel to get the Trustee to correct
4
5 these misstatements, the Trustee's pleadings continue to mislead the Court.
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8 The Hoffs do not oppose the Motion. But they do not believe the record should be
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10 left in its current erroneous state. The UCC filing date may be critical in the likely
11
12 upcoming litigation over the very dispute about which the Trustee continues to misstate the
13
14 record: the dispute over the Hoffs' perfected (or unperfected) lien on the "Medallic assets"
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16 owned or formerly owned by MACLLC. It is time to set the record straight.
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19
20 Respectfully submitted,
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22 DATED: May 2, 2018
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PERKINS COIE LLP

25 By:/s/ Alan D. Smith

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33 Attorneys for Landlord Robert and Connie
34 Hoff
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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2018, I caused the foregoing to be filed with the Clerk of the Court using the CM/ECF system which sent notifications of this filing to all parties listed in the case to receive notice electronically.

I further certify that I caused a copy of the same to be sent via first class mail to parties not receiving notice via the CM/ECF system.

/s/ Alan D. Smith
Alan D. Smith

HOFF STATEMENT CORRECTING RECORD – 3

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